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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

Jon Charles Beyer
And Shelley Renee Beyer

Plaintiffs,

Vs.

BRIAN T. MOYNIHAN, *and/or his
successor*, individually, and in his official
capacity as **PRES/CEO OF BAC HOME
LOANS SERVICNG, LP**, *an ens legis
being used to conceal fraud*,

JAMES F. TAYLOR *and/or his
successor*, individually, and in his official
capacity as **PRES. OF FIN. & ADMIN.
OF RECONTRUST COMPANY, N.A.**,
an ens legis being used to conceal fraud,

BRIAN T. MOYNIHAN, *and/or his
successor*, individually, and in his official
capacity as **PRES/CEO OF BANK OF
AMERICA**, *an ens legis used to conceal
fraud*,

ANGELO MAZILO, *and/or his successor*,
individually, and in his official capacity as
**PRES/CEO OF COUNTRYWIDE
HOME LOANS, INC.**, *an ens legis being
used to conceal fraud*,

Case no: 10-CV-00523-MO

MOTION FOR ENTRY OF DEFAULT

R.K. ARNOLD *and/or his successor,*
individually, and in his official capacity as
PRES/CEO OF MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, INC., *an ens legis being used*
to conceal fraud,

JAMES STROTHER, *and/or his*
successor, individually, and in his official
capacity as **EVP of WELLS FARGO &**
CO., *an ens legis being used to conceal*
fraud, et al,
Defendant

Plaintiff(s) Jon Charles Beyer and Shelley Renee Beyer move the clerk of court to enter default against defendant(s) Brian T. Moynihan, James F. Taylor, R.K. Arnold, and James Strother pursuant to Federal Rule of Civil Procedure 55(a). In support of this request plaintiff(s) rely upon the record in this case and the affidavit submitted herein.

Dated this 15 day of June 2010.

Jon Charles Beyer
Jon Charles Beyer

Shelley Renee Beyer
Shelley Renee Beyer

CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY, I CERTIFY that a copy of the foregoing MOTION FOR ENTRY OF DEFAULT and AFFIDAVIT IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT was provided by regular U.S. mail to Pilar C. French, LANE POWELL, PC, 601 SW SECOND AVE, SUITE 2100, PORTLAND, OR 97204-3158.

I CERTIFY that a good faith effort was made to communicate with opposing counsel with a view toward resolving the issues raised by the foregoing motion, however the parties are at an *impasse*.

Shelley-Renee Beyer

Shelley Renee Beyer

35100 Burt Road

Saint Helens, OR 97051

503-750-6930

STATE OF OREGON

COUNTY OF Columbia

BEFORE ME personally appeared Shelley Renee Beyer who, being by me first duly sworn and identified in accordance with Oregon law, did execute the foregoing in my presence this 25th day of

June 2010.

Rosanne Bellisle

Notary Public

My commission expires: 8/21/2011

